

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS
CENTRAL DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. 4:17-CV-40011-TSH
)	
v.)	Judge Timothy S. Hillman
)	
DAVID L. TOPPIN,)	
JENNIFER TOPPIN,)	
DEUTSCHE BANK NATIONAL TRUST)	
COMPANY as Trustee for RESIDENTIAL)	
ASSET SECURITIZATION TRUST Series)	
2013-A14, MORTGAGE PASS-THROUGH)	
CERTIFICATES Series 2003-N,)	
UPS CAPITAL BUSINESS CREDIT f/k/a)	
FIRST INTERNATIONAL BANK,)	
COMMONWEALTH OF MASSACHUSETTS,)	
TOWN OF HOLDEN,)	
TOWN OF AMHERST, and)	
TOWN OF GARDNER)	
)	
Defendants.)	

**DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE'S OPPOSITION
TO DAVID TOPPIN'S MOTION TO COMPEL DISCOVERY**

Defendant Deutsche Bank National Trust Company, as Trustee for Residential Asset Securitization Trust Series 2003-A14 Mortgage Pass-Through Certificates Series 2003-N ("Deutsche Bank as Trustee") opposes David Toppin's Motion to Compel further responses to his discovery requests. As reasons therefore Deutsche Bank as Trustee states the following:

1. On or about Saturday December 1, 2018 at 10:50pm, counsel for Deutsche Bank as Trustee received an email from David Toppin containing requests for admissions, interrogatories and request for production of documents.

2. The majority of the requests were not directed at Deutsche Bank as Trustee, but rather requested information regarding the U.S. government and Toppin's own citizenship status. Deutsche Bank as Trustee is unable to respond to any such requests directed at other parties or regarding information not in its custody or control.
3. Deutsche Bank as Trustee provided full and complete responses to Toppin's discovery request on January 2, 2019.
4. Deutsche Bank as Trustee's responses to Admissions, Interrogatories and Production of Documents requests are attached to this opposition.
5. Toppin has failed to identify which responses he believes are deficient or lacking in any way and has failed to conference the matter prior to filing this meritless motion to compel.

WHEREFORE Deutsche Bank as Trustee requests this court deny Toppin's motion to compel discovery responses, as Deutsche Bank as Trustee responded to the requests.

Respectfully submitted by
Defendant Deutsche Bank National Trust Company, as
Trustee for Residential Asset Securitization Trust Series
2003-A14 Mortgage Pass-Through Certificates Series
2003-N

s/ Stephanie Sprague
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CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that on the 14th day of February 2019, this document, filed through the ECF system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

A copy of the foregoing document was also served upon the following party who is not a registered CM/ECF participant, via First Class United States mail:

David L. Toppin
465 Salisbury St.
Holden, MA 01520

/s/ Stephanie Sprague
Stephanie Sprague